

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

KENNETH COOK, JOHN WILLIAM	§	C.A. No.: 4:16-cv-00542
COOK, JAMES HANNA, REBECCA	§	
WALKER JENSEN, JAMES KENT and	§	
DEERFIELD INVESTMENTS LTD, each	§	
Individually, and on behalf of those	§	JURY TRIAL DEMANDED
similarly situated,	§	
	§	
Plaintiffs,	§	
V.	§	
	§	
AT&T CORP.	§	
	§	
Defendant.	§	CLASS ACTION PURSUANT TO FED. R. CIV. P. 23

MARTHA COOK, EXECUTOR	§	
OF THE ESTATE OF DOYCE COOK,	§	
	§	
PLAINTIFF	§	
	§	C.A. No.: 4:16-cv-00381
	§	
V.	§	
	§	
AT&T CORP.,	§	
	§	
DEFENDANT	§	JURY TRIAL DEMANDED

PLAINTIFFS' INITIAL DISCLOSURES

Plaintiffs Kenneth Cook, Martha Cook, John William Cook, James Hanna, Rebecca Walker Jensen, James Kent, and Deerfield Investments Ltd, individually and as representatives of the putative class defined herein (the "Class"), make these initial disclosures as required by Federal Rule of Civil Procedure 26(a)(1).

I. INITIAL DISCLOSURES

A. Individuals with Discoverable Information

1. The names, addresses (work and home), and telephone numbers (work and home) of individuals likely to have discoverable information that Plaintiff may use to support his claims are:

Plaintiffs Kenneth Cook, Martha Cook, John William Cook, James Hanna, Rebecca Walker Jensen, James Kent, and Deerfield Investments Ltd, individually and as representatives of the putative class defined herein
c/o The Buzbee Law Firm
600 Travis St., Ste. 7300
Houston, Texas 77002
(713) 223-5393

AT&T Corp, and their employees
c/o Haynes and Boone
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
(214) 651-5000

B. Relevant Documents & Tangible Things

2. **Such documents have been produced.**

C. Information Related to Calculation of Damages

3. **Such documents have been produced. Please refer to Plaintiffs' experts' reports. Discovery is ongoing, and Plaintiffs reserve the right to supplement.**

D. Insurance

4. **Not applicable.**

II. DISCLOSURE OF EXPERT TESTIMONY:

- A. Identity of any person who may be used at trial to present evidence under rules 702, 703, or 705 of the Federal Rules of Evidence.

Bryan E. Vento
Environmental Evaluations & Consulting:
4510 Windy Hollow
Kingwood, Texas 77345
(281) 361-7174

David Howell
Pipeline Equities
510 Bering, Suite 300
Houston, Texas 77057
(713) 623-0090

Ronald E. Plackemeier
Lyons & Plackemeier
518 9th Ave. N
Texas City, Texas 77502
(409) 797-4149

B. Experts' written reports.

Such documents have been produced.

Respectfully submitted,

THE BUZBEE LAW FIRM

/s/ Andrew Dao

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ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document will be served or has been served on all interested parties in accordance with the Federal Rules of Civil Procedure on July 21, 2017. Service on E-Filing Users will be automatically accomplished through the Notice of Electronic Filing; non-Filing Users will be served by certified mail, return receipt requested and/or via facsimile.

/s/ Andrew Dao
Andrew Dao